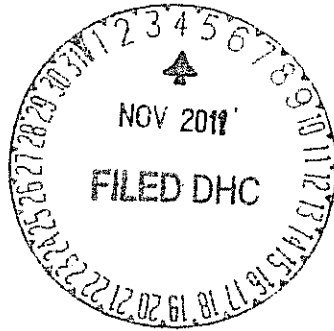


NORTH CAROLINA

WAKE COUNTY



BEFORE THE
DISCIPLINARY HEARING COMMISSION
OF THE
NORTH CAROLINA STATE BAR
11 DHC 28

THE NORTH CAROLINA STATE BAR,

Plaintiff,

v.

ANSWER

LOUIE WILSON, III, Attorney,

Defendant

NOW COMES the Defendant, answering the complaint of the Plaintiff and alleges and says:

1. The allegations of paragraph 1 of the Complaint are admitted.
2. The allegations of paragraph 2 of the Complaint are admitted.
3. The allegations of paragraph 3 of the Complaint are admitted.
4. The allegations of paragraph 4 of the Complaint are admitted.
5. The allegations of paragraph 5 of the Complaint are admitted.
6. The allegations of paragraph 6 of the Complaint are admitted.
7. In response to the allegations of paragraph 7 of the Complaint, it is admitted that Defendant entrusted the maintenance of the RBC trust account to his assistant. **Defendant made very limited use of the account.**
8. In response to the allegations of paragraph 8, Defendant denies not instructing his assistant regarding the proper use and maintenance of the trust account. **Defendant worked with his assistant for years, and she was a holdover employee from a previous position, also working with Defendant, with similar responsibilities.** However, the remaining allegations of paragraph 8 of the Complaint are admitted.
9. In response to the allegations of paragraph 9 of the Complaint, Defendant admits that he did only occasionally review.
10. The allegations of paragraph 10 of the Complaint are admitted.

11. The allegations of paragraph 11 of the Complaint are admitted.


FURTHER ANSWERING THE COMPLAINT

While the Defendant does not deny that there were mistakes made and that he should have exercised more oversight of his legal assistant, there was never intent on Defendant's part to misappropriate trust funds, or funds intended for the trust account. Defendant has cooperated with the Bar during the course of the investigation and once it was brought to Defendant's attention that defendant's assistant misappropriated funds, Defendant took corrective action. The affected clients have been returned all of the \$1400 which was misappropriated by Defendant's assistant.

WHEREFORE, the Defendant prays the Disciplinary Hearing Commission as follows:

1. That the Disciplinary Hearing Commission (DHC) determine that the State Bar has not established the charged misconduct by clear, cogent and convincing evidence, take no disciplinary action thereon, and dismiss this action or in the alternative, the DHC issue non-disciplinary action and/or order training assistance be substituted in its stead; and
2. Any other such relief as deemed appropriate by the DHC.

This the 4th day of November, 2011.

A handwritten signature in black ink, appearing to read 'Louie Wilson III', with a stylized flourish at the end.

Louie Wilson III, Defendant

N.C. State Bar No. 25835